



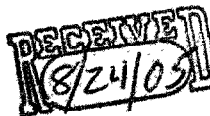
182 Tabor Road
Morris Plains, NJ 07950
Tel 973 385 0965

0864 5 OCT 28 P2:06

Norma Skolnik
Director, Regulatory Affairs, Americas

August 9, 2005

Dr. Robert Brackett
U.S. Food and Drug Administration
Center for Food Safety and Applied Nutrition
Harvey W. Wiley Federal Building
5100 Paint Branch Parkway
College Park, MD 20740-3835



Dear Dr. Brackett,

Pursuant to Section 6 of the Dietary Supplement Health and Education Act, Cadbury Adams USA LLC wishes to notify the Food and Drug Administration that it is within the current 30 day period marketing a dietary supplement which will now bear the following structure/function statement for our HALLS DEFENSE® VITAMIN C, Echinacea and Zinc Supplement Drops. (This product was previously known as HALLS DEFENSE Multiblend Supplement Drops.)

"Helps Support Your Immune System"

This statement is accompanied by the required disclaimer which is prominently displayed on the package label.

This structure/function statement is based on scientific data which renders the statement substantiated, truthful and non-misleading.

Sincerely Yours,

Norma Skolnik
Director, Regulatory Affairs, Americas
Cadbury Adams USA LLC
Morris Plains, NJ 07950

2005-6901
AIMS

975 0162 - 6

975 0162 LET 16 715